

**Description**

Employee/subcontractor training, like maintenance or a piece of equipment, is not so much a best management practice as it is a method by which to implement BMPs. This fact sheet highlights the importance of training and of integrating the elements of employee/subcontractor training from the individual source controls into a comprehensive training program as a part of a Storm Water Pollution Prevention Plan (SWPPP).

The specific employee/subcontractor training aspects of each of the source controls are highlighted in the individual fact sheets. The focus of this fact sheet is more general, and includes the overall objectives and approach for assuring employee/subcontractor training in stormwater pollution prevention. Accordingly, the organization of this fact sheet differs somewhat from the other fact sheets in this section.

Objective

Employee/subcontractor training should be based on four objectives:

- # Promote a clear identification and understanding of the problem, including activities with the potential to pollute stormwater;
- # Identify solutions (BMPs);
- # Promote employee/subcontractor ownership of the problems and the solutions; and
- # Integrate employee/subcontractor feedback into training and BMP implementation.

Approach

- # Integrate training regarding stormwater quality management with existing training programs that may be required for your business by other regulations such as the 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) standard (29 CFR 1910.120); and the Spill Prevention Control and Countermeasure (SPCC) Plan (40 CFR 112).
- # Supervisors and inspectors should receive additional annual 8-hour refresher courses.
- # Businesses, particularly smaller ones that may not be regulated by Federal, State, or local regulations, may use the information in this BMP Manual to develop a training program to reduce their potential to pollute stormwater.
- # Use the quick reference on disposal alternatives (Table CP-15-1) to train

employee/ subcontractors in proper and consistent methods for disposal.

- # Consider posting the quick reference table around the job site or in the on-site office trailer to reinforce training.
- # Train employee/subcontractors in standard operating procedures and spill cleanup techniques described in the fact sheets. Employee/subcontractors trained in spill containment and cleanup should be present during the loading/unloading and handling of materials.
- # Personnel who use pesticides should be trained in their use.
- # Proper education of off-site contractors is often overlooked. The conscientious efforts of well trained employee/subcontractors can be lost by unknowing off-site contractors, so make sure they are well informed about what they are expected to do on-site.

**Primary
References**

California Storm Water Best Management Practice Handbooks, Construction and Industrial Handbooks, CDM et.al. for the California SWQTF, 1993.

Caltrans Storm Water Quality Handbooks, CDM et.al. for the California Department of Transportation, 1997.